

THE HONORABLE RICARDO S. MARTINEZ

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

**IN RE AMAZON SUBSCRIPTION  
SERVICES LITIGATION**

Case No. 2:22-cv-00910-RSM

**PARTIALLY AMENDED JOINT  
STATUS REPORT**

1 Counsel for Plaintiffs and Defendants Amazon.com, Inc. and Amazon.com Services LLC  
2 (“Amazon” or “Defendants”) (collectively “Parties”) seek to amend their respective proposed  
3 schedules as outlined in Section 4 of the Joint Status Report and Discovery Plan, filed on July 12,  
4 2024. Dkt. 52. The Parties incorporate their July 12, 2024 Joint Status Report into this submission  
5 and do not seek to modify it at this time in any way other than as set forth herein.

6 Given that the Court has not yet issued a ruling on the Parties’ proposed case schedules,  
7 that the Parties’ disputes regarding their competing protective orders and ESI protocols remain  
8 outstanding, and given the pace of discovery to-date, the Parties seek to modify the case schedules  
9 they initially proposed in Section 4 of their Joint Status Report and Discovery Plan (Dkt. 52) as  
10 follows:

11 Plaintiffs’ Position:

12 Plaintiffs note that the Parties have now agreed on a revised schedule for Plaintiffs’ motion  
13 for class certification and related expert reports, as reflected in the Parties’ respective proposals  
14 below. Plaintiffs continue to reserve rights to seek an extension of the revised dates proposed  
15 herein depending on the pace of discovery and other case developments, or as otherwise warranted.

16 Plaintiffs also note Amazon’s statement below that “If a class is certified, Amazon will  
17 produce evidence as to the identities of individual class members for any certified class within  
18 sixty (60) days of an Order certifying a class.” For the avoidance of doubt, Plaintiffs state that they  
19 do not agree that this assertion fully sets forth Amazon’s discovery obligations post-class-  
20 certification, or otherwise, nor do they agree presently to the timeline Amazon proposes with  
21 respect to production of the material Amazon specifically references.

22 Further, Plaintiffs note Amazon’s statement below that “The Parties will confer in good  
23 faith regarding additional deadlines if and as needed.” While Plaintiffs will confer with Amazon  
24 in good faith regarding deadlines if and as needed, they note their continuing disagreement with  
25 Amazon as to the date for completion of non-expert discovery, as set forth in the Parties’ respective  
26 positions below. Also, Plaintiffs note that they have submitted additional dates for the Court’s  
27 consideration in the original joint status report, Dkt. 52, beyond those set forth below. Those  
28

proposed dates are based on the date on which the Court issues its order as to Plaintiffs' motion for class certification.

EVENT	PLAINTIFFS' INITIAL PROPOSAL	PLAINTIFFS' MODIFIED PROPOSAL
Substantial completion of non-expert discovery		July 31, 2025
Deadline for Plaintiffs' class certification motion, including any supporting expert reports	May 12, 2025	September 24, 2025
Deadline for Amazon's opposition to Plaintiffs' motion for class certification, including any expert reports	June 16, 2025	November 24, 2025
Deadline for Plaintiffs' reply in support of motion for class certification, including any rebuttal expert reports	July 14, 2025	January 15, 2026
Completion of non-expert discovery	Within 3 months after Court's order on class certification	Within 3 months after Court's order on class certification

Amazon's Position:

The Parties will confer in good faith regarding additional deadlines if and as needed.

EVENT	AMAZON'S INITIAL PROPOSAL	AMAZON'S MODIFIED PROPOSAL
Completion of non-expert discovery	January 10, 2025	July 31, 2025
Deadline for Plaintiffs' class certification motion, including any supporting expert reports	February 14, 2025	September 24, 2025
Deadline for Amazon's opposition to Plaintiffs' motion for class certification, including any expert reports	April 14, 2025	November 24, 2025

1 2 3 4 5	Deadline for Plaintiffs' reply in support of motion for class certification, including any supporting rebuttal expert reports	May 23, 2025	January 15, 2026
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6 If a class is certified, Amazon will produce evidence as to the identities of individual class  
7 members for any certified class within sixty (60) days of an Order certifying a class.

8 Dated this 24th day of October, 2024

Respectfully submitted,

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1 Dated this 24th day of October, 2024

Respectfully submitted,

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13 Dated this 24th day of October 2024

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25 Dated this 24th day of October 2024

Respectfully submitted,

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\* *Pro hac vice* application forthcoming

**CERTIFICATE OF SERVICE**

I hereby certify that on October 24, 2024, a true and correct copy of the foregoing was  
filed electronically by CM/ECF, which caused notice to be sent to all counsel of record.

/s/ Brian D. Buckley

Brian D. Buckley